

1 Roopal P. Luhana (*pro hac vice*)
2 **CHAFFIN LUHANA LLP**
3 600 Third Avenue, 12th Floor
4 New York, NY 10016
5 Telephone: (888) 480-1123
6 Facsimile: (888) 499-1123
7 luhana@chaffinluhana.com
8 Sarah R. London (SBN 267093)

6 **GIRARD SHARP LLP**
7 601 California St., Suite 1400
8 San Francisco, CA 94108
9 Telephone: (415) 981-4800
10 slondon@girardsharp.com
11 Rachel B. Abrams (SBN 209316)

10 **PEIFFER WOLF CARR KANE CONWAY &**
11 **WISE, LLP**
12 555 Montgomery Street, Suite 820
13 San Francisco, CA 94111
14 Telephone: (415) 426-5641
15 Facsimile: (415) 840-9435
16 rabrams@peifferwolf.com

15 *Co-Lead Counsel For Plaintiffs*

17 IN THE UNITED STATES DISTRICT COURT
18 FOR THE NORTHERN DISTRICT OF CALIFORNIA

19
20 IN RE: UBER TECHNOLOGIES, INC.,
21 PASSENGER SEXUAL ASSAULT
22 LITIGATION

22 This Document Relates to:
23 ALL CASES

Case No. 23-md-03084-CRB

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

25 **TO: THE COURT, PARTIES, AND ALL COUNSEL OF RECORD:**

26 Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs hereby move the Court to consider
27 whether certain materials should be sealed. Plaintiffs file these materials under seal out of an
28

abundance of caution because they contain references to documents produced and marked confidential by Uber.

Material To Be Filed Under Seal

The materials to be filed under seal are portions of Plaintiff's letter brief and exhibits to same:

Document	Description	Designating Party
[Partially Redacted] Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber
[Partially Redacted] Exhibit A to Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber
[Partially Redacted] Exhibit B to Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber
Exhibit D [Filed Under Seal] to Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber
Exhibit E [Filed Under Seal] to Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber
Exhibit F [Filed Under Seal] to Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber
[Partially Redacted] Exhibit H to Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber

Under Local Rule 79-5(f)(3), Uber bears the responsibility to establish that all of the designated material is sealable and must "file a statement and/or declaration as described in subsection (c)(1)" of the Local Rules. None of the information at issue was marked confidential by Plaintiffs. Pursuant to the Court's order at Dkt. 1559, Uber must file its statement within one day.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Rachel B. Abrams in Support of this Motion; and

2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: September 24, 2025

Respectfully submitted,

By: /s/ Rachel B. Abrams

Rachel B. Abrams (SBN 209316)
**PEIFFER WOLF CARR KANE
CONWAY & WISE, LLP**
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: (415) 426-5641
Facsimile: (415) 840-9435
rabrams@peifferwolf.com

By: /s/ Sarah R. London

Sarah R. London (SBN 267093)
**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008
slondon@lchb.com

By: /s/ Roopal P. Luhana

Roopal P. Luhana
CHAFFIN LUHANA LLP
600 Third Avenue, 12th Floor
New York, NY 10016
Telephone: (888) 480-1123
Facsimile: (888) 499-1123
luhana@chaffinluhana.com

Co-Lead Counsel for Plaintiffs